

March 14, 2012

Dr. Lek Kadeli
Acting Assistant Administrator for Research and Development
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue
Washington, DC 20460

Dear Dr. Kadeli:

First, congratulations on your appointment as Acting Assistant Administrator for ORD. We look forward to working with you.

Secondly, we want to thank you for your recent announcement regarding the Ramazzini Institute's study on methanol. The Agency's response to this most troubling report from the Pathology Working Group's review of the study's slides was straight-forward and much appreciated by us.

We realize that in taking over the leadership of ORD, there are likely many matters on your desk that merit your attention. We want to bring to your attention two decisions that are pending in your office awaiting your action that relate to methanol, with the hope that you will be able to expedite the decision process on both.

One of the items is a request that we made on July 9, 2010 related to the original IRIS assessment for methanol of January, 2010 that relied very heavily on the Ramazzini methanol study for cancer classification. We asked that it be removed from the IRIS website because of the problems with the Ramazzini study results. In light of the most recent PWG report, there should be no doubt now in EPA's mind that this original draft cancer assessment, if allowed to stand, is very misleading with regard to the current knowledge of the science. For it to remain on the IRIS website mischaracterizes EPA's position and, equally important, could mislead regulatory officials and the public about the current state of the science. While we believe complete removal of the document is the best solution to this dramatic change in the science, if you are disinclined to remove it completely, we request that the document be changed to have the words "Not Current" or some equivalent words printed on EVERY page of that document so that anyone downloading it in the future will not be misled.

The other pending item has to do with the non-cancer portion of the assessment. On November 17, 2011 we wrote Dr. Anastas alerting him to the very serious criticisms of the IRIS draft assessment on non-cancer effects of methanol by the Peer Review Panel chartered by the Eastern Research Group. We asked that in light of the seriousness of the criticisms from the Panel that EPA commit to a further peer review and public comment on any revised draft. A copy of our letter to Dr. Anastas is attached so that you can review our reasoning for this request. To date, we have received indications that the Agency plans to take the revised document to interagency review, but that our request for further peer review and public comment is still pending. Now that considerable time has passed for the staff to decide how they will respond to the

peer review, we respectfully request that you review our request and grant it in the interest of full transparency and accountability on the part of the IRIS program.

Thank you in advance for your attention to these two pending matters related to methanol. We look forward to your response and would welcome the opportunity to meet with you to discuss these issues in person at your earliest convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Dolan', written in a cursive style.

Gregory Dolan
Acting CEO

cc: Vincent Cogliano
Becki Clark
Kevin Teichman
John Vandenberg
Jeff Gift